

PUBLIC SUBMISSION

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AD45 - Incorporate API Spec 14A for Subsurface Safety Valve Equipment

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FR Proposed Rule AD45

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General Comment

Baker Oil Tools supports the proposal to revise 30 CFR 250.807 to accept the 11th Edition of API-14A (and its specified functional test provisions) for safety valves in use in OCS waters and require Operators provide new information when submitting an Application for Permit to Drill, an Application for Permit to Modify, or a Deepwater Operations Plans (DWOP) that demonstrates the SSSV and related equipment are fit-for-purpose for performing in HPHT environments. Baker Oil Tools believes the current design verification and validation activities specified in the 11th Edition of API-14A, which has been in effect since May 1, 2006, have and will continue to reasonably ensure products are fit-for-purpose in all pressure and temperature environments.

